

Peter Goldstein [SBN 6992]
PETER GOLDSTEIN LAW CORP
peter@petergoldsteinlaw.com
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 474-6400
Facsimile: (888) 400-8799

Attorneys for Plaintiff
DOUGLAS SEYMOUR

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA – LAS VEGAS

DOUGLAS SEYMOUR,

Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; JOHN WOODRUFF; and
JOHN DOES 1 to 50, inclusive,

Defendants.

Case No.: 2:20-cv-00937-RFB-VCF

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND DATES FOR BRIEFING
RELATED TO DEFENDANT WOODRUFF’S
MOTION FOR PARTIAL SUMMARY
JUDGEMENT**

(First Request)

Plaintiff DOUGLAS SEYMOUR and Defendants LAS VEGAS METROPOLITAN POLICE
DEPARTMENT and JOHN WOODRUFF, by and through their counsel of record, hereby stipulate
and agree as follows:

Plaintiff’s deadline to respond to Defendant John Woodruff’s pending motion for summary
judgement (Dkt. 59), filed on November 12, 2021, is extended from December 3, 2021 up to and
including **December 10, 2021**.

Ofc. Woodruff’s deadline to file a reply in support of his motion for summary judgment shall
be extended up to and including December 31, 2021.

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1 This request for an extension is made in good faith and joined by all the parties in this case.
2 The request is timely pursuant to LR 26-3; well in advance of any current deadline. Accordingly,
3 this extension will not delay this case.

4 IT IS SO STIPULATED.

5 DATED: December 1, 2021

PETER GOLDSTEIN LAW CORP

6
7 By: /s/ Peter Goldstein
8 PETER GOLDSTEIN
9 Attorneys for Plaintiff
DOUGLAS SEYMOUR

10 DATED: December 1, 2021

KAEMPFER CROWELL

11
12 By: /s/ Lyssa S. Anderson
13 LYSSA S. ANDERSON
14 RYAN W. DANIELS
15 Attorneys for Defendants
LAS VEGAS METROPOLITAN POLICE
DEPARTMENT


16 DATED: December 1, 2021

MCNUTT LAW FIRM, P.C.

17
18 By: /s/ Daniel R. McNutt
19 DANIEL R. MCNUTT
20 MATTHEW C. WOLF
21 Attorneys for Defendant
22 JOHN WOODRUFF

23 IT IS SO ORDERED.

24 DATED this 7th day of ~~December~~, 2021

25
26 
27 **RICHARD E. BOULWARE, II**
28 **United States District Court**

CERTIFICATE OF SERVICE

I am employed in the County of Clark, State of Nevada. I am over the age of eighteen years and not a party to the within action; my business address is 10161 Park Run Drive, Suite 150, Las Vegas, Nevada 89145.

I hereby certify that on this 1st, day of December, 2021, a true and correct copy of the following document **STIPULATION AND [PROPOSED] ORDER TO EXTEND DATES FOR BRIEFING RELATED TO DEFENDANT WOODRUFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT** was served by electronically filing with the Court's CM/ECF electronic filing system to the following parties:

Lyssa S. Anderson, Esq.
Ryan W. Daniels, Esq.
Kristopher Kalkowski, Esq.
KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135
Telephone: (702) 792-7000
Facsimile: (702) 796-7181
Email: landerson@kcnvlaw.com
rdaniels@kcnvlaw.com
kkalkowski@kcnvlaw.com
BJacobs@kcnvlaw.com
WApplegate@kcnvlaw.com
eparker@kcnvlaw.com

*Attorneys for Defendant
Las Vegas Metropolitan Police Department*

Daniel R. McNutt, Esq.
Matthew C. Wolf, Esq.
MCNUTT LAW FIRM, P.C.
11441 Allerton Park Drive, #100
Las Vegas, Nevada 89135
Telephone: (702) 384-1170
Facsimile: (702) 384-5529
Email: drm@mcnuttlawfirm.com
mcw@mcnuttlawfirm.com
lah@mcnuttlawfirm.com

*Attorneys for Defendant
John Woodruff*

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

By: 
An Employee of Peter Goldstein Law Corp



Peter Goldstein <pglawstaff@petergoldsteinlaw.com>

SEYMOUR - Final Review and Approve Affix Signatures - SAO to Extend Dates for Woodruff MPSJ Briefing

6 messages

Kris Bechtold <pglawstaff@petergoldsteinlaw.com>

Wed, Dec 1, 2021 at 3:50 PM

To: Matt Wolf <mcw@mcnuttlawfirm.com>, Dan McNutt <drm@mcnuttlawfirm.com>, Lyssa Anderson <landerson@kcnvlaw.com>, Ryan Daniels <RDaniels@kcnvlaw.com>, Peter Goldstein <peter@petergoldsteinlaw.com>
Bcc: Peter Goldstein <pglawstaff@petergoldsteinlaw.com>

Attached for final review and approval for filing please find the Stipulation and [Proposed] Order to Extend Dates for Briefing Related to Woodruff's Motion for Partial Summary Judgment. Please indicate your approval to affix your signature and I'll file.

Thank you,
Kris Bechtold
Legal Assistant
Kris Bechtold
Legal Assistant

**PETER GOLDSTEIN LAW CORP**

10161 Park Run Drive, Suite 150

Las Vegas, NV 89145

Tel: (702) 474-6400

Fax: (888) 400-8799

www.petergoldsteinlaw.com

400 Corporate Pointe, Ste. 300

Culver City, CA 90230

Tel: (310) 552-2050

Fax: (888) 400-8799

www.petergoldsteinlaw.com

Kris Bechtold <pglawstaff@petergoldsteinlaw.com>

Wed, Dec 1, 2021 at 3:52 PM

To: Matt Wolf <mcw@mcnuttlawfirm.com>, Dan McNutt <drm@mcnuttlawfirm.com>, Lyssa Anderson <landerson@kcnvlaw.com>, Ryan Daniels <RDaniels@kcnvlaw.com>, Peter Goldstein <peter@petergoldsteinlaw.com>

Attached

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**2021.12.01 SAO re Woodruff MSJ Briefing.pdf**

123K

Matt Wolf <mcw@mcnuttlawfirm.com>

Wed, Dec 1, 2021 at 3:53 PM

To: Kris Bechtold <pglawstaff@petergoldsteinlaw.com>, Dan McNutt <drm@mcnuttlawfirm.com>, Lyssa Anderson <landerson@kcnvlaw.com>, Ryan Daniels <RDaniels@kcnvlaw.com>, Peter Goldstein <peter@petergoldsteinlaw.com>

You have my approval.

[Quoted text hidden]

Peter Goldstein <peter@petergoldsteinlaw.com>

Wed, Dec 1, 2021 at 4:10 PM

To: Matt Wolf <mcw@mcnuttlawfirm.com>

Cc: Kris Bechtold <pglawstaff@petergoldsteinlaw.com>, Dan McNutt <drm@mcnuttlawfirm.com>, Lyssa Anderson <landerson@kcnvlaw.com>, Ryan Daniels <RDaniels@kcnvlaw.com>

Thanks, Lyssa if you have a chance can you email us your approval.



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Fax: (888) 400-8799

www.petergoldsteinlaw.com

400 Corporate Pointe, Ste. 300

[Culver City, CA 90230](#)

Tel: (310) 552-2050

Fax: (888) 400-8799

www.petergoldsteinlaw.com

[Quoted text hidden]

Lyssa Anderson <landerson@kcnvlaw.com>

Wed, Dec 1, 2021 at 4:16 PM

To: Peter Goldstein <peter@petergoldsteinlaw.com>

Cc: Matt Wolf <mcw@mcnuttlawfirm.com>, Kris Bechtold <pglawstaff@petergoldsteinlaw.com>, Dan McNutt <drm@mcnuttlawfirm.com>, Ryan Daniels <RDaniels@kcnvlaw.com>

Approved. Thanks.

Best Regards,
Lyssa S. Anderson

On Dec 1, 2021, at 4:11 PM, Peter Goldstein <peter@petergoldsteinlaw.com> wrote:

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